BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

Mar | 459 PM '00

POSTAL RETT COMPLETED OFFICE OF THE SECTION NAMED

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

### RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MOELLER TO INTERROGATORY OF ALLIANCE OF NONPROFIT MAILERS (ANM/USPS-T35—2)

The United States Postal Service hereby provides the response of witness Moeller to the following interrogatory of the Alliance of Nonprofit Mailers:

ANM/USPS-T35—2, filed on February 16, 2000. Objections to interrogatories

ANM/USPS-T35-1, 3, 5, and 6 were filed on February 28, 2000. Interrogatories

ANM/USPS-T35-4, 5, and 6 are redirected to the Postal Service for response.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Anthony Alverno

Attorney

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2997; Fax –6187 March 1, 2000

# U.S. POSTAL SERVICE WITNESS MOELLER RESPONSE TO INTERROGATORIES OF ALLIANCE OF NONPROFIT MAILERS

ANM/USPS-T35-2. Please produce a table showing the rate changes for nonprofit ECR Standard (A) mail that would follow from the Postal Service's proposed cost estimates if the existing statutory constraints on preferred rates remain unchanged. Please use a format comparable to "Standard Mail Rate Schedule [321.3] 322" (USPS Request, Attachment B, page 17).

### RESPONSE:

Please see my response to Presiding Officer's Information Request #2, Question 1.

Also, see the attached for the rates presented in the requested format. As the Board of Governors would review the Postal Service's rate proposal, I do not represent this response to present what the Postal Service's proposal would be in the hypothetical stated in the question.

# Standard Mail Rate Schedule 324

# Nonprofit Enhanced Carrier Route Subclass<sup>1</sup>

	Current	USPS/ANM-T35-2
	Rate (cents)	Rate (cents)
Letter Size	(come)	(001110)
Piece Rate		
Basic	9.9	13.6
Basic Automated Letter <sup>2</sup>	9.2	10.0
High Density	7.8	11.3
Saturation	7.2	10.7
Destination Entry Discount per Piece		
BMC	1.6	1.7
SCF	2.1	2.2
DDU	2.6	2.8
Non-Letter Size <sup>3</sup>		
Piece Rate		
Minimum per Piece⁴	0.0	40.0
Basic	9.9	13.6
High Density	9.2	12.0
Saturation	8.4	11.5
Destination Entry Discount per Piece		
BMC	1.6	1.7
SCF	2.1	2.2
DDU	2.6	2.8
Pound Rate <sup>4</sup>	29.0	45.0
Plus per Piece Rate		
Basic	3.9	4.3
High Density	3.2	2.7
Saturation	2.4	2.2
Destination Entry Discount per Pound		
BMC	7.9	8.3
SCF	10.0	10.8
DDU	12.6	13.4

## **DECLARATION**

I, Joseph D. Moeller, declare under penalty of perjury that the foregoing answers
are true and correct, to the best of my knowledge, information, and belief.

JOSEPH D. MOELLER

Dated: 3 1 00

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Anthony Alverno

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2997; Fax –6187 March 1, 2000